

EXHIBIT B

DAMAGES OF RICK DEES

1. Backpay—The backpay cannot fully be determined at this time because Plaintiff has not received information on the earnings of Rod Stancliffe who was one of the F & I Managers at Kings Dodge. (Plaintiff has received information on the earnings of Swartz and Gaines.) Backpay will be determined by subtracting Mr. Dees' earnings from the earnings of the F & I Managers from June 2000 to the present.
2. Front pay—will be calculated in a similar method as backpay once Plaintiff receives all earnings information. It will continue until a time when he will earn as much as the F & I Manager would have earned.
3. Emotional distress—This will be determined by the jury in its sound discretion.
4. Punitive damages—This will be determined by the jury in its sound discretion.
5. Attorney fees and costs—This will be awarded by the Court through petition of Plaintiff's attorneys when and if it becomes applicable.
6. Prejudgment interest—This will be presented to the Court in post-trial petition.